

## REMARKS

## Examiner

5        Claim 1 is rejected under 35 U.S.C. 103(a) as being obvious over Oberteuffer et al. (6,438,523), in view of Young et al. (6,064,959). Claims 2-8 are rejected under 35 U.S.C. 103(a) as being obvious over Oberteuffer et al. and Young et al., and further in view of Larkey (5,127,055) and Carmen, II (5,454,046).

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## Response

15        Oberteuffer et al., in the cited Col.5, lines 3-23 (and Figs.2-3) appear to use additional data provided by both the handwritten (or drawn) input and speech input to generate an enhanced interpretation of the multimodal input.

20        However, the Applicant is unable to find teachings in Oberteuffer et al., explicit, suggested, or implied, of the method used to select from among “recognition candidates” to generate the stated “enhanced interpretation”. Col.5, lines 8-11 of Oberteuffer et al. merely states that the handwritten input data is used to “select from among recognition candidates” identified by the speech recognition process. As such, Oberteuffer et al. does not appear to anticipate the claim 1 limitation of “generating a third list that is an intersection of characters common to the first list and the second list”. The Applicant believes that, without the benefit of impermissible hindsight afforded by present invention (MPEP 2141), Oberteuffer et al. does not disclose the specifically claimed selection method.

25        Nor would the claimed “intersection” method be considered inherent or obvious. For example, perhaps Oberteuffer et al. utilizes a selection method disclosed in Fig.9 of Waibel et al. (US 5,855,000) cited by the Examiner in the Office action dated 11/05/2003. In Waibel et al., lists generated by each input are

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given various confidence ratings and the selection having the highest combined multimodal confidence rating is chosen as the final selection. Selection according to combined confidence ratings is clearly different from the claimed intersection method. Admittedly, the Applicant is unable to find evidence that Oberteuffer et al. utilizes the method of Waibel et al., but the Applicant is also unable to find any evidence that the selection process utilized by Oberteuffer et al. is different than that of Fig.9 of Waibel et al.

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Another equally viable possible selection method is found in the Examiner cited Patent U.S. 6,694,295 by Lindhom et al. Here, keyboard input is used to reduce the number of possibilities in a speech generated first list. For example, typing the letter "s" would retrieve from memory (from the speech generated first list) only the possibilities that begin with the letter "s". Typing "sm" would restrict retrieval to words beginning with the letters "sm" ( Col.4, line 64 through Col.5, line 13). Even though in the disclosure of Lindom et al. typing in specific characters "XY" would return only words beginning with "XY", this is not the same as taking the intersection of the two "lists".

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Although the present invention is not to be limited to any specific language, a simple English example using the method of Lindom et al. and the claimed method can easily demonstrate different real world results. Please assume for the example an ideal situation where the speech recognition and the hand writing systems of both disclosures are equal and completely accurate. A user speaks the letter "b" into each respective microphone and each system generates a first list of ["b", "be", and "bee"].

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Now, according to the present invention, if a user types in the letter "b" generating a second list of ["b"], an intersection of the first list and the second list is taken to form the third list consisting of ["b"]. On the other hand, the method of Lindom et al. will return everything in the first list that begins with the letter "b" yielding a third list of ["b", "be", "bee"]. Obviously, Lindom et al.'s third list of ["b", "be", "bee"] is different from the present invention's third list of ["b"]

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and necessitates differing and possibly additional actions on the part of the user. In tonal languages having a large number of homophones such as Mandarin Chinese, the differences between the two methods quickly may become problematic for the user. It is not known if Oberteuffer et al. utilizes the method of Lindom et al. It is clear however, that Oberteuffer et al. does not teach generating a third list by taking an intersection of the first and second lists. Nor does the other known prior art.

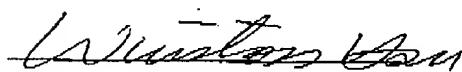
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As a result, the Applicant believes that none of the cited references, alone or in combination fully anticipate the claimed invention. Additionally, two examples have been provided as equally viable selection method alternatives to provide evidence that the claimed intersection method is neither inherent nor obvious. Therefore, reconsideration of claims 1-8 is respectfully requested.

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Sincerely yours,

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